

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO  
INTERACTIVE SOFTWARE, INC. ,

Defendants.

CASE NO. 1:17-cv-02635-CAB

**MOTION FOR PRO HAC VICE ADMISSION TO  
PRACTICE FOR JULIEN JEAN-GEORGE CROCKETT**

Pursuant to Local Rule 83.5(h), and the attached Declaration, Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, “Take-Two”) respectfully move for the *pro hac vice* admission of Julien Jean-George Crockett. In support of this motion, the following is submitted:

1. The undersigned, Matthew J. Cavanagh, has entered his appearance as counsel of record for Take-Two.

2. Take-Two has also retained Julien Jean-George Crockett to represent its interest in the above-captioned proceeding. The contact information for Mr. Crockett is as follows:

Kirkland & Ellis LLP  
555 California Street  
27th Floor  
San Francisco, CA 94104  
Tel: (415) 439-1400  
Fax: (415) 439-1500  
julien.crockett@kirkland.com

3. As set forth in the Declaration of Mr. Crockett, which is attached as Exhibit A, Mr. Crockett is admitted in, and is in good standing to practice before: the California bar, the bars of the United States District Court for the Northern District of California and Central District of California. Mr. Crockett was admitted to practice in the State of California in 2021.

4. I provided a copy of the Local Rules of this Court to Mr. Crockett, and he agrees to abide by them and to submit to the jurisdiction of this Court for purposes of any disciplinary action that might arise out of his representation of Take-Two in this case.

WHEREFORE, Take-Two respectfully requests an Order authorizing the *pro hac vice* admission of Mr. Crockett.

Dated: April 14, 2024

/s/ Matthew J. Cavanagh

Matthew J. Cavanagh (OH 0079522)  
MCDONALD HOPKINS LLC  
600 Superior Avenue, East, Ste. 2100  
Cleveland, Ohio 44114  
Telephone: 216.348.5400  
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*Attorney for Defendants 2K Games, Inc. and  
Take-Two Interactive Software, Inc.*

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**DECLARATION OF JULIEN JEAN-GEORGE CROCKETT IN  
SUPPORT OF *PRO HAC VICE* ADMISSION**

I, Julien Jean-George Crockett, being first duly sworn according to law herein, depose and state as follows:

1. I submit this declaration in support of the motion of Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, “Take-Two”) for my *pro hac vice* admission to appear and participate fully as an attorney of record in all proceedings and other aspects of this action.

2. I was admitted to the bar of the State of California in 2021 and am a member in good standing of such. I am also admitted in, and am in good standing to practice before: the California bar, the bars of the United States District Court for the Northern District of California and Central District of California

3. Pursuant to Local Rule 83.5(h), my required contact information and bar registration numbers are as follows:

Julien Jean-George Crockett  
Kirkland & Ellis LLP  
555 California Street  
27th Floor  
San Francisco, CA 94104  
Tel: (415) 439-1400  
Fax: (415) 439-1500  
julien.crockett@kirkland.com  
California Bar Registration No. 335532

4. I have never been disbarred or suspended from practice before any court, department, bureau or commission of any state or the United States.

5. I have never received any reprimand from any court, department, bureau or commission of any state or the United States pertaining to conduct or fitness as a member of the bar.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 14, 2024

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Julien Jean-George Crockett

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**[PROPOSED] ORDER GRANTING MOTION FOR *PRO HAC VICE***  
**ADMISSION TO PRACTICE FOR JULIEN JEAN-GEORGE CROCKETT**

Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, “Take-Two”) moved the Court for an order permitting Julien Jean-George Crockett to represent and appear for all purposes in this action on behalf of Take-Two. The Court has reviewed the Motion and the Declaration filed pursuant to Local Civil Rule 83.5(h), and Take-Two’s Motion is hereby GRANTED and Julien Jean-George Crockett of Kirkland & Ellis LLP shall be permitted to practice before this Court *pro hac vice*.

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Judge Christopher A. Boyko  
UNITED STATES DISTRICT COURT